ADVENTURE FACILITY
CONCEPTS & MANAGEMENT

INTERNAL RULES AND INFORMATION

on the procedure for reporting irregularities and breaches in Adventure Facility Concepts and Management OOD in accordance with the Bulgarian Act on Protection of Persons, Reporting Information, or Publicly Disclosing Information about Breaches

1. Purpose

1. Protection on the persons in the private sector which submit signals or publicly disclose information for breaches on the Bulgarian legislation or on acts of the EU, became them known at or by occasion the performance on labor or official ones them obligations or in another working context .

2. Internal reporting in accordance with the Bulgarian Act on Protection of Persons, Reporting Information, or Publicly Disclosing Information about Breaches (the law) for breaches on the Bulgarian legislation or on acts on European union (EU) which endanger or damage public interest and right of the EU.

2. Persons who receive Protection

Protection by the law is provided from the moment of the submission on the signal or the public disclosure on information for a breach , became known to the person his capacity of:

- worker, employee or other person who performs wage labor, regardless of the nature of the work, the method of payment and the source of financing;
- a person who works without an employment relationship and/or exercises a free profession;
- volunteer or intern;
- partner, shareholder, sole owner of the capital, member of the management or control body of a commercial company, member of the audit committee of an enterprise;
- a person who works for a physical or legal person, its subcontractors or suppliers;
- a job candidate and in this capacity received information about a breach of the Bulgarian legislation or on acts on European union (EU) which endanger or damage public interest and right of the EU ;
- a worker or an employee, when the information was obtained within the time of an employment or service relationship that was terminated at the time of the filing of the report or of the public disclosure;
- any other whistleblower who reports a breach that became known to him in a work context.

3. Areas of reports of breaches under the law

Reports of breaches and irregularities, filed under the law, must relate to one or more of the following areas and be related to the activity of "Adventure Facility Concepts and Management"

- procurement;
- financial services ;
- product safety and compliance;
- environmental Protection;
- radiation protection;
- Food Safety;
- public health;
- legislation related to the performance of public service;
- protection of privacy and personal data;
- security of networks and information systems;
- breaches that affect the financial interests of the European Union;
- labor legislation;
- the acts of the European Union, according to the law

4. Filling a signal through an internal channel

Irregularities and breaches can be signaled through an internal channel for signals, expressly created in "Adventure Facility Concepts and Management " under the law .

The signal shall be filled in one of the following ways:

- **e-mail: signal@adventurefacilities.com**
- **by phone call** on +359 8 84294110 , within the working hours of "Adventure Facility Concepts and Management" - every working day of the week **from 09:00** hours **until 17:00** o'clock;
- **during a personal meeting with the officials;**
- **by letter to: City of Sofia, Bulgaria "Tsarigradsko Shose" Blvd. No. 111B, fl. 3** , specifying the name of the official as recipient.

The verbal submission on signal could be done through the above-mentioned phone number, others systems for voices messages , and through **personal meeting ,** in arranged between the parties suitable term at the address "Tsarigradsko Shose" Blvd. No. 111B, 3rd floor. The verbal report is entered on a form by the official who offers the whistleblower to sign it.

The written signal shall be made through filling on form by sample of CPDP, available on the website of "Adventure Facility Concepts and Management" - www.adventurefacilities.com and sending it by e-mail to the specified e-mail addresses of the officials or by letter to the specified address and addressee.

Any kind of sources of information supporting the stated statements and/or documents can be attached to the alert, including indicating data on persons who could confirm the information or provide additional information.

If the signal contains irregularities, a message is sent to the whistleblower to correct the irregularities within 7 days of receiving the signal. If the irregularities are not corrected within this period, all documentation will be returned to the whistleblower and the case will be closed.

5. Check for regularity of a given signal

Each signal is checked for its credibility. Signals that do not fall within the scope of the law and those that do not give reasons to be considered credible are not considered. Reports that contain obviously false or misleading statements of fact will be returned to the sender to correct the statements and information regarding his/her liability for accusation of a false information under the law.

6.Signal registration

The signal will be registered in a signal register and the officials are obligated to confirm the receipt of the signal within 7 days of receipt, to the person who submitted the signal, together with the unique identification number of the report issued from CPDP. The register is not public.

Upon submission of reasonable reports, an inspection is carried out, in the course of which relevant actions are taken within 3 months from the registration of the report.

In the case of initiated investigations, the officials have the right to request additional information from the person who submitted the signal and third parties and to examine the affected person, who in turn has the right to object and to present evidence in own defense. If it is necessary to take action with the assistance of a state body, the report can be forwarded to the CPDP, with prior notification to the person who submitted the report.

7. Proceedings shall not be taken for:

- anonymous signals;
- signals relating to breaches committed more than two years ago.
- are irregular and the irregularities have not been corrected within the specified period;
- contain false or misleading statements of fact and the statements are not corrected within the specified period;
- contain allegations of breaches outside the scope of the law;
- refer to breaches of the protection of classified information within the meaning of Art. 1, para. 3 of the Law on Protection of Classified Information;
- have become known to persons exercising a legal profession and for whom there is an obligation by law to protect professional secrecy;
- refer to breaches of the confidentiality of health information within the meaning of Art. 27 of the Health Act;
- refer to breaches of the secrecy of the judicial conference;
- refer to breaches of the rules of criminal procedure;
- breaches in other areas that do not fall within the scope of the law

9. Conflict of interest

A report filed against the official for receiving, registering and considering reports of irregularities and breaches or against the manager/s of "Adventure Facility Concepts and Management" shall be filled in the CPDP.

10. Resolution

The persons obliged to consider reports prepare and submit to the manager/s of "Adventure Facility Concepts and Management" a motivated proposal for taking specific measures to stop or prevent the breach in question when it is established that the facts presented in the report are confirmed by the collected evidence or when it is assessed , that the inspection should be terminated.

11. Inspection decision

With a Decision of the manager/s of "Adventure Facility Concepts and Management", follow-up actions can be taken within the scope of his competence to stop the breach or to prevent it, if it has not started.

12. Termination of verification

The inspection is terminated by a Decision of the manager/s of "Adventure Facility Concepts and Management" , when:

1. the breach for which the report was filed is a minor case and does not require additional follow-up actions to be taken. Termination does not affect other obligations or applicable procedures in relation to the reported breach, nor the protection under the law with respect to internal or external whistleblowing;

2. is a repeated signal that does not contain new information of essential importance for a breach in respect of which an investigation has already been completed, unless new legal or factual circumstances justify taking follow-up actions;

3. if evidence of a crime has been committed, the report and related materials must be immediately sent to the public prosecutor's office.

Information about the Decision of the manager/s of "Adventure Facility Concepts and Management" is sent to the person who filed the signal, together with the final report. The decision is not subject to appeal.

13. Inspection report

Within a period - no longer than 3 months after the confirmation of the registration of the signal, an individual report is prepared, which briefly describes the information from the signal, the actions taken, the final results of the check on the signal, which, together with the reasons, is communicated to the person who submitted the report or employee and the affected person in compliance with the obligation to protect them.

14. Duty of confidentiality

Appropriate measures are taken - technical and organizational to protect the information related to the submitted reports of breaches, and to protect both the identity of the reporting persons

and to protect the identity of the affected persons, providing access to the information only to the employees, who need this data to perform their official duties.

15. Providing protection

Protection is provided persons who have reported or publicly disclosed information about a breach , **prohibiting** any form of retaliatory actions against them, having the character of repression and putting them in a disadvantageous position, as well as threats or attempts of such actions, including the actions according to Art. 33 of the law.

16. Disclaimer

Whistleblowers are not responsible:

- for the acquisition of, or access to, the information that has been reported or publicly disclosed, provided that such acquisition or access does not constitute an independent crime;
- for violating the restrictions on disclosure of information provided by a contract, legal or by-law or administrative act, provided that they have reasonable grounds to believe that the reporting or public disclosure of the information was necessary to detect a breach;
- when reporting or publicly disclosing information about v breaches falling within the scope of this law, and such information includes a trade secret, and when that person meets the conditions of this law, such reporting or public disclosure shall be considered lawful within the meaning of Art. 7, para. 2 of the Law on the Protection of Trade Secrets.

17. Liability

There is a liability in case the information disclosed in the signal was acquired as a result of a crime, as well as for any action of its own that is not related to the signal or is not necessary for the detection of the breach. Whistleblowers are responsible for knowingly reporting false information. When it is established that the person knowingly filed a report or made public false information, he is punished with a **fine of BGN 3,000 to BGN 7,000** . The right of the affected person to claim compensation for damages is preserved, according to the law.

In accordance with the law a signal on irregularities and breaches can be submitted orally or in writing and through an external reporting **channel managed by the Directorate "External Whistleblower Channel" in the CPDP, as well as to any other state or European body, with the CPDP verifying regularity** and the merits of the report under the terms and conditions of Section II of the same Act. At the latest within 3 months from the confirmation of a reported report, the CPDP shall provide the whistleblower with feedback. This period can be extended up to 6 months in duly justified cases requiring a thorough investigation.

Reports to the CPLD can be sent to the address: Sofia, "Prof. Tsvetan Lazarov " No. 2, via e-mail kzld@cpdp.bq . and the website www.cpdp.bg or by calling the contact phone number 02/91-53-519.

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/ Ivaylo Penkov Penchev /